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March 16, 2020

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BY ECF AND EMAIL

The Honorable Alison J. Nathan
United States District Judge
Thurgood Marshall Courthouse
40 Foley Square, Room 2102
New York, NY 10007
Re: *United States v. Dante Stephens*, No. 15-cr-95 (AJN)

Dear Judge Nathan:

As counsel to Dante Stephens, we respectfully move, per the attached emergency motion for reconsideration of bail conditions, that Mr. Stephens be released from the MCC to remain in home confinement until his violation of supervised release ("VOSR") hearing on March 25, 2020. The Government and Probation do not consent to this request.

If the Court wishes to hold a hearing on this motion for reconsideration, the defense is available for a hearing by phone or video at which we would waive our client's presence, as explained in our motion. If bail is not granted, and in the event the VOSR hearing can be expedited, defense counsel is now available for such a hearing the week of March 16, 2020, although seriously questions whether holding such a hearing (with the need for in person testimony) is advisable or safe. The Government does not oppose moving the VOSR hearing to an earlier date, and will respond with its availability today after consulting with its witnesses.

Please note that we believe Mr. Stephens's next state court date is also currently scheduled for March 25 and, if it goes forward, thus conflicts with the current date for the VOSR.

Dated: March 16, 2020

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Anthony S. Barkow

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